

From: "Nakayama, Granta" <GNakayama@KSLAW.com>

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To: "Peter Tsirigotis (Tsirigotis.peter@epa.gov)" <Tsirigotis.peter@epa.gov>

Cc: Angus Crane <acrane@naima.org>

Subject: North American Insulation Manufacturers Association (NAIMA) -- Wool Fiberglass MACT Standard (Part 63, Subpart NNN)

Dear Peter,

I am writing on behalf of the North American Insulation Manufacturers Association (NAIMA) regarding the Wool Fiberglass MACT Standard (Part 63, Subpart NNN), and more specifically, the flame attenuation line limits in that standard. NAIMA requests that EPA delay by one year the compliance date for flame attenuation lines for the reasons discussed below. NAIMA will provide a formal request, including supporting information, by letter, but they also wanted to promptly alert you in the meantime given the imminent compliance date.

Background: The July 2015 revisions to Subpart NNN significantly expanded the standard's applicability to flame attenuation lines. Prior to that, for existing sources, the standard imposed only formaldehyde limits on lines used to manufacture pipe insulation. Throughout the industry, only one production line was subject to these prior limits. EPA Method 316 was used to show compliance. Other than to provide data for the residual risk analysis discussed below, little if any data existed for phenol and methanol, which the revised standard now regulates. Generally that data was very old and was gathered to support the original NNN rulemaking in the 1990s. The revised standard has formaldehyde, phenol, and methanol limits and now applies to flame attenuation lines manufacturing any product. EPA's analysis, when setting the emission limits, was that no add-on controls would be required.

Flame attenuation lines are used to make specialty products – products that require a finer fiber than rotary lines, the predominant type of manufacturing in the industry, can achieve. Flame attenuation lines use high air flows and have generally low production rates (known as glass pull rates in the industry) to achieve the desired product. The more fine a fiber that is required, the lower the production rate. In certain lines, this rate is less than 0.1 tons per hour of glass, which is significant because the standard expresses limits in pounds of emissions per ton of glass pulled. There are typically three stacks on a line, two in fiber forming and collection, and one in curing. These emissions are added to determine compliance with the emissions limit. For the lines with the lowest production rates, this means, for example, the three stacks combined would have to emit less than 0.05 pounds per hour of methanol to meet the standard's 0.5 pound per ton of glass pulled limit.

Previously Identified, but Unaddressed Issue: NAIMA members having flame attenuation lines have discovered that this combination of high air flows and low glass pull rates presents a problem. Even where emissions were non-detect using the Method 318 (prescribed by the rule), at a detection of 1 ppm or less, these lines show to be above the rule's emission limit when using the detection limit in the calculation. In addition, this has often been the case even when half of the detection limit is used in the calculation. In short, for flame attenuation lines, the industry sees no way it can demonstrate compliance with the rule as written, even were they to install additional controls, because even if a source were controlling to non-detect levels, calculating compliance at detection or half-detection would indicate emissions exceeding the limit.

NAIMA and its members propose an alternative, equivalent pound per hour limit for flame attenuation lines pulling less than one ton per hour of glass. This proposed limit would make it possible to demonstrate compliance with many of the lines. NAIMA requested a pound per hour limit for flame attenuation lines with low production rates in its comments to the proposed rule (see Comments of the North American Insulation Manufacturers Association on Behalf of the Wool Fiber Glass Manufacturers to EPA's Supplemental Proposal, document number 0348 in the rulemaking docket at page 48, January 14, 2015), but EPA did not respond to that comment.

Significant New Technical Issue: However, that is not the only issue faced by operators of flame attenuation lines. When formaldehyde, phenol, and methanol data were collected for the residual risk analysis on flame attenuation lines, they were collected using Method 316, with analysis by NCASI CI/WM-98.01. However, when the standards were set, the NCASI analytical method was not allowed. While Method 316 was allowed to demonstrate compliance with the formaldehyde limit, it was not allowed for phenol or methanol. Thus, compliance demonstrations are required to be made using methods that were, save formaldehyde, not used to gather the data used to set the emission limits. When combined with the fact that companies had not historically tested for phenol or methanol, it was impossible to know at promulgation whether it was possible to meet the new standards.

Moreover, NAIMA has just been learned that the testing company that gathered the data used to set the flame attenuation emission limits recently discovered they made an error in their calculations. While the error affected all results for all constituents, it was far more pronounced for phenol and methanol, underestimating those emissions by a factor of about nine. This error was made on all flame attenuation lines used to set the standards. The testing company has provided corrected emission calculations, which in turn have been given to EPA with an explanation of the error. In short, the testing company took an aliquot of the impinger liquid to analyze for phenol and methanol, and after the lab provided the mass of each pollutant in the aliquot, the testing company failed to ratio that up to the total volume of impinger liquid collected. When the emissions are already relatively small, there is no way to make up for this error for phenol and methanol, even if controls were installed.

While the Clean Air Act allows three years to demonstrate compliance, EPA only allowed a two-year compliance period for flame attenuation lines, ostensibly because no capital expenditures were expected to be necessary. This has created an untenable situation in which compliance with the promulgated standard is not possible.

Request: NAIMA and its affected members request that EPA delay the compliance date by a year to give time to find a solution to these problems, likely by recalculating the emission limit after the test data has been corrected, and by identifying a way to resolve problems for lines with extremely low glass pull rates, perhaps by setting a feasible, measurable pound per hour limit. The industry is ready to work quickly with the Agency on this issue, but unless some EPA action is taken, at least 90 percent of the flame attenuation lines operated by NAIMA members will be unable to continue operations beyond the current compliance date of July 31, 2017. This would result in an immediate loss of more than 200 jobs and would further endanger the jobs of workers who depend on the business activity of these facilities or that use the specialized products these lines produce.

Thanks,

Grant

Granta ("Grant") Y. Nakayama
King & Spalding LLP
1700 Pennsylvania Ave., N.W. Suite 200
Washington, DC 20006
Phone: +1 (202) 626-3733
Email: gnakayama@kslaw.com

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